

## Waterson, Sara

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**From:** Waterson, Sara  
**Sent:** Thursday, November 19, 2020 11:31 AM  
**To:** Dickie, Morgan (Health); Palmer, Darren  
**Cc:** Walshe-Langford, Gillian (Health)  
**Subject:** RE: IT Wildfire Qualifier

Thanks, Morgan and Darren.

Morgan- You would not submit a request for an exclusion or EE demo at this time. If you did, we would not act on it until (or rather if) there is a regulatory impact. Now, that's not to say that you shouldn't create a file folder to save this information should you need to submit the demo in the future. At this point it sounds like noting the data with the "I" flag is the best thing to do at this time.

Thanks!

Sara

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**From:** Dickie, Morgan (Health) <Morgan.Dickie@nashville.gov>  
**Sent:** Thursday, November 19, 2020 11:19 AM  
**To:** Palmer, Darren <Palmer.Darren@epa.gov>; Waterson, Sara <Waterson.Sara@epa.gov>  
**Cc:** Walshe-Langford, Gillian (Health) <gillian.walshe-langford@nashville.gov>  
**Subject:** RE: IT Wildfire Qualifier

Thank you for the information Darren, that all makes sense. We will use the informational qualifiers accordingly. I do not think we are planning on submitting a request exclusion or EE demo for that data unless advised to do so. We did not exceed the PM2.5 primary NAAQs standard of 35 µg/m<sup>3</sup> on either day for our primary monitor (the BAM 1022). Below are the daily averages from those days at Lockeland for reference. The T640x did exceed the PM2.5 primary NAAQs standard on 10/8, however that is our AQI-only monitor and will already have a NAAQs exclusion in place since being deployed at the site after the tornado repairs (the NAAQs exclusion request for the T640x is being submitted to EPA with our Q3 data submission coming up soon).

|             |          |           | 10/8<br>Avg | 10/9<br>Avg |
|-------------|----------|-----------|-------------|-------------|
| PM10_CONTIN | T640x    | LOCKELAND | 63.7        | 42.8        |
| PM25_1HR    | BAM 1022 | LOCKELAND | 27.5        | 22.8        |
| PM25LC      | T640x    | LOCKELAND | 36.0        | 30.8        |

Cheers,

Morgan Dickie  
Environmental Health Specialist | Metro Public Health Department  
(615) 340-0568

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**From:** Palmer, Darren <[Palmer.Darren@epa.gov](mailto:Palmer.Darren@epa.gov)>  
**Sent:** Thursday, November 19, 2020 10:06 AM  
**To:** Dickie, Morgan (Health) <[Morgan.Dickie@nashville.gov](mailto:Morgan.Dickie@nashville.gov)>; Waterson, Sara <[Waterson.Sara@epa.gov](mailto:Waterson.Sara@epa.gov)>  
**Cc:** Walshe-Langford, Gillian (Health) <[Gillian.Walshe-Langford@nashville.gov](mailto:Gillian.Walshe-Langford@nashville.gov)>  
**Subject:** RE: IT Wildfire Qualifier

I think they didn't exactly state the answer correctly (or they should have qualified it more). I listened in to the call as well. It was ok overall. I wanted to respond to several things, but the chat box was disabled for me. I couldn't type anything into it or see anything typed into it.

Agencies are welcome to apply the “Informational Only” flags whenever they feel it's appropriate. You don't need to notify us if you apply one or more of those qualifier flags. I've actually encouraged this practice ever since those flags were made available. What we (EPA) try to caution against is adding the “Request Exclusion” flags to data that you aren't going to be submitting an Exceptional Event demonstration for. The “R” flags suggest there is an action that EPA needs to take. In Region 4, our recommendation is to apply the “I” flags first and then once you are intending to submit an EE Demo to EPA to exclude data from regulatory decision making, changing the “I” flags to “R” flags on those data for which you are requesting exclusion. These actions meet the intention of the Exceptional Events rule.

Darren Palmer  
USEPA - Region 4 | Air & Radiation Division | Air Data & Analysis Section  
(404) 562-9052 | <http://www.epa.gov/region4>

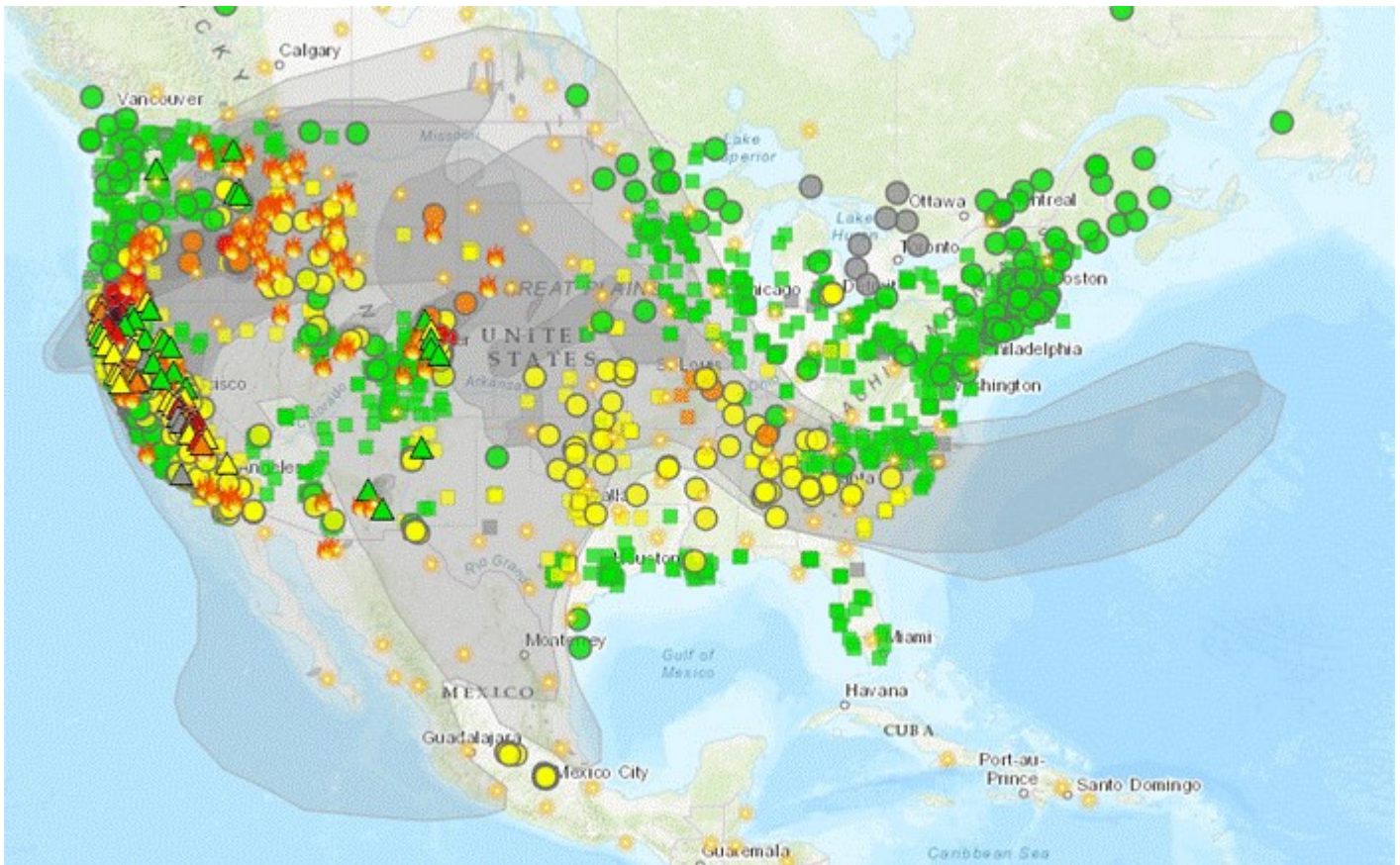
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**From:** Dickie, Morgan (Health) <[Morgan.Dickie@nashville.gov](mailto:Morgan.Dickie@nashville.gov)>  
**Sent:** Thursday, November 19, 2020 10:46 AM  
**To:** Waterson, Sara <[Waterson.Sara@epa.gov](mailto:Waterson.Sara@epa.gov)>; Palmer, Darren <[Palmer.Darren@epa.gov](mailto:Palmer.Darren@epa.gov)>  
**Cc:** Walshe-Langford, Gillian (Health) <[gillian.walshe-langford@nashville.gov](mailto:gillian.walshe-langford@nashville.gov)>  
**Subject:** IT Wildfire Qualifier

Hi Sara & Darren,

I was tuned in to the AQS Ask the Experts Webinar yesterday and they mentioned to notify your EPA regional contacts if an agency is applying the IT – Wildfire, US qualifier code to any PM data as a result of the western wildfires. We saw elevated PM levels 10/8/20-10/9/20 from western wildfire smoke plumes and were planning to use the IT qualifier code as applicable. I've attached a strip chart from our Lockeland monitors (the blank section is invalidated data from flow

rate verifications) and an excel file with the raw data and the IT qualifier applied. Below is also an image of the AirNow smoke map from that period demonstrating that this is likely valid data. Please let us know if you think this qualifier code has been applied correctly, as well as if any further action is required regarding the exceptional event rule.



Thank you!  
Morgan Dickie  
Environmental Health Specialist | Metro Public Health Department  
(615) 340-0568

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